

Wendy Medura Krincek, Bar No. 6417
wkrincek@littler.com
Kelsey E. Stegall, Bar No. 14279
kstegall@littler.com
LITTLER MENDELSON P.C.
3960 Howard Hughes Parkway
Suite 300
Las Vegas, Nevada 89169.5937
Telephone: 702.862.8800
Fax No.: 702.862.8811

Attorneys for Defendants
UHS OF DELAWARE, INC. AND
VALLEY HEALTH SYSTEM, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

GARY DAVIS and SCOTT SCRIBNER,

Plaintiffs,

v.

UNIVERSAL HEALTH SERVICES INC., a
Delaware Corporation; UHS OF DELAWARE,
INC., a Delaware Corporation; VALLEY
HEALTH SYSTEM, LLC, a Delaware Limited
Liability,

Defendants.

Case No. 2:21-cv-00008-RFB-VCF

**STIPULATION AND (PROPOSED)
ORDER TO EXTEND DISPOSITIVE
MOTIONS DEADLINES**

[FIRST REQUEST]

Pursuant to LR IA 6-1, 6-2, and LR 26-4, Defendants UHS OF DELAWARE, INC. (“UHS”); and VALLEY HEALTH SYSTEM, LLC (“VHS”) (collectively “Defendants”), and Plaintiffs GARY DAVIS and SCOTT SCRIBNER (“Plaintiffs”), by and through their undersigned counsel, hereby stipulate to extend the dispositive motions deadlines, (ECF No. 43), by extending the dispositive motions deadline for a period of thirty (30) days.

This is the first request for an extension to the dispositive motions’ deadline in this matter. The requested extension is sought in good faith and not for purposes of undue delay. This request is submitted at least twenty-one (21) days before each deadline set forth below.

The dispositive motion deadline is currently Wednesday, September 28, 2022. Counsel for

Defendants just completed a two-week federal jury trial and needs the additional time due to the backlog that the trial caused. As such, good cause exists for this extension, and the parties stipulate and agree that the dispositive motion deadline will be moved to **Friday, October 28, 2022**.

Accordingly, the parties agree that dispositive motions shall be due on October 28, 2022. This request is not sought for any improper purpose or other reason of delay. No party is prejudiced by the requested extension.

Dated: September 7, 2022

Dated: September 7, 2022

Respectfully submitted,

Respectfully submitted,



/s/ Michael P. Balaban, Esq.

MICHAEL P. BALABAN, ESQ.
LAW OFFICES OF MICHAEL P.
BALABAN

WENDY M. KRINCEK, ESQ.
KELSEY E. STEGALL, ESQ.
LITTLER MENDELSON, P.C.

Attorneys for Plaintiffs
GARY DAVIS and SCOTT SCRIBNER

Attorneys for Defendants
UHS OF DELAWARE, INC. and
VALLEY HEALTH SYSTEM, LLC

IT IS SO ORDERED.



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 8th day of September, 2022.

4858-7996-5232.1 / 069080-1182